

Appendix E. Minimum Requirement/Tool Worksheets

Step 1- Determining the Minimum Requirement (a two-part process)

Part A. Minimum Requirement Key to making determinations on wilderness management proposals

(This flow chart will help you assess whether the project is the minimum required action for the administration of the area as wilderness. Answering these questions will determine *if* this proposed action really is the *minimum required* action in wilderness.)

<u>Guiding Questions</u>	<u>Answers and explanations</u>
<p>1. <u>Is this an emergency?</u> (i.e. a situation that involves an inescapable urgency and temporary need for speed beyond that available by primitive means, such as fire suppression, health and safety of people, law enforcement efforts involving serious crime or fugitive pursuit, retrieval of the deceased or an immediate aircraft accident investigation)</p> <p>If Yes> Document the rationale for line officer approval using the minimum tool form and proceed with action.</p> <p>If No> Go to question 2</p>	<p>No. The proposed action is not considered an emergency.</p>
<p>2. <u>Does the project or activity conflict with the stated management goals, objectives and desired future conditions of applicable legislation, policy and management plans?</u></p> <p>If Yes> Do not proceed with the proposed project or activity.</p> <p>If No> Go to question 3</p>	<p>No. Currently no approved wilderness management plan exists for the involved wilderness areas. Management is based on law, regulation, and policy. BLM wilderness policy provides for the use of motorized and mechanized equipment, including aircraft use to remove wild horses and burros when it is considered the minimum tool that can accomplish the task with the least lasting impact to wilderness values.</p>
<p>3. <u>Is there any less intrusive actions that should be tried first?</u>(i.e. signing, visitor education, or information)</p> <p>If yes> Implement other actions using the appropriate process.</p> <p>If No> Go to question 4</p>	<p>No. The only way to reduce the excess population of wild horses in the Wilderness Areas to the Appropriate Management Level (AML) is to physically remove the excess horses from the area.</p>

<p>4. <u>Can this project or activity be accomplished outside of wilderness and still achieve its objectives?</u>(such as some group events)</p> <p>If Yes> Proceed with action outside of wilderness using the appropriate process.</p> <p>If No> Go to question 5</p>	<p>No. Conducting the horse gather outside of wilderness could possibly allow BLM to reach AML in the overall Herd Management Areas, but it would not reduce the impacts that the horses are having on the Wilderness Areas. The temporary corrals/traps however will be located outside of the wilderness boundary.</p>
<p>5. <u>Is this project or activity subject to valid existing rights?</u> (such as mining claims or right of way easements)</p> <p>If Yes> Proceed to Minimum Tool Analysis</p> <p>If No> Go to question 6</p>	<p>No. Valid existing rights are not associated with the proposed action.</p>
<p>6. <u>Is their special provisions in legislation (the Wilderness Act of 1964 or the Black Rock Desert-High Rock Canyon Emigrant Trails NCA Act of 2000) that allows this project or activity?</u></p> <p>If Yes> the proposed project or activity should be considered but is not necessarily <u>required</u> just because it is mentioned in legislation. Go to part B</p> <p>If No> Go to Part B</p>	<p>No. There are no special provisions dealing with wild horses in the legislation.</p>

Part B- Determining the Minimum Requirement

Responsive Questions for Minimum Requirement Analysis: Explain your answer in the response column. If your responses indicate potential adverse affects to wilderness character, evaluate whether or not you should proceed with the proposal. If you decide to proceed, begin developing plans to mitigate impacts, and complete a Minimum Tool Analysis. Some of the following questions may not apply to every project.

Effects on Wilderness Character	Responses
<p>1. How does this project/activity benefit the wilderness as a whole as opposed to one resource?</p>	<p>The objective of the proposed action is to remove excess wild horses from the Calico Mountains, Warm Springs Canyon, Black Rock Range East, and Black Rock Range West HMAs, which includes portions of six</p>

	designated wilderness areas. Excess wild horses can have a negative impact to the naturalness of the wilderness areas, by competing with the areas native populations of wildlife, overgrazing riparian areas, and trampling springs. The proposed action would maintain and enhance the naturalness of the wilderness areas by removing the excess horses and the impacts they are having on the overall naturalness of the areas.
2. If this project/activity were not completed, what would be the beneficial and detrimental effects to the wilderness resources?	If the proposed action were not conducted the excess number of horses would continue to compete with native wildlife and impact the vegetation resources of the wilderness. The impacts to solitude and primitive recreation that would be associated with the gather operations would not occur if the proposed action was not completed.
3. How would the project or activity help ensure that the wilderness provides outstanding opportunities for solitude or a primitive and unconfined type of recreation? (e.g. does the project/activity contribute to the people's sense that they are in a remote place with opportunities for self discovery, adventure, quietness, connection with nature, freedom, etc.)	The project would not enhance the opportunities for solitude or for primitive and unconfined recreation. During the time frame that the crews would be conducting the gather the opportunities for solitude and primitive recreation would be reduced, but the impact would be temporary and relatively short in duration. The impacts to these opportunities will also be mitigated by conducting the gather operations during a time of the year when the Wilderness Areas receive very little visitation.
4. How would the project/activity help ensure that human presence is kept to a minimum and that the area is affected primarily by the forces of nature rather than being manipulated by humans?	Although the Wild and Free Roaming Horse and Burro Act of 1971 mandates that BLM manage horses as an integral part of the natural systems where they are found, wild horses are human introductions into the wilderness areas and overpopulations of horses can impact the naturalness of the areas. Removing excess horses would maintain and enhance the naturalness of the areas and allow the area to be affected primarily by the forces of nature.
Management Situation 5. What does your management plan, policy, and legislation say to support proceeding with this project?	Currently no approved wilderness management plan exists for the involved wilderness areas. Management is based on law, regulation, and policy. BLM wilderness policy provides for the use of motorized and

	mechanized equipment, including aircraft use to remove excess wild horses and burros when it is considered the minimum tool that can accomplish the task with the least lasting impact to wilderness values.
6. How did you consider wilderness values over convenience, comfort, political, economic or commercial values while evaluating this project/activity?	The purpose of the proposed action is to enhance the naturalness of the wilderness areas by removing excess horses, and alleviating the impacts that they are having on the naturalness of the areas.
7. Should We Proceed?	Yes Go to step 2 (Minimum Tool Analysis)

Step 2 - Determining the Minimum Tool (the Minimum Tool Analysis)

These questions will assist you in determining the appropriate tool(s) to accomplish the project or proposed activity with the least impact to the wilderness resource.

Develop several alternate approaches to implementing the project or activity. At a minimum consider the following three alternatives.

Alt#1 An alternative using motorized equipment or mechanized transport	Alt#2 An alternative using non-motorized equipment or non-mechanized transport	Alt#3 Variations of methods 1 and 2, as appropriate
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Describe the alternatives. Be specific and provide detail.

- What is proposed?
- Why is it being proposed in this manner?
- Who is the proponent?
- When will the project take place?
- Where will the project take place?
- How will it be accomplished? (What methods and techniques)

<p>Alt#1 To remove excess horses from the Calico Mountains, Warm Springs Canyon, Black Rock Range East, and Black Rock Range West HMAs</p> <p>The horses would be gathered using helicopters to herd the horses and burros to traps outside of Wilderness. Helicopter assisted roping methods could also be used if required.</p> <p>Gathering the horses using these methods would require low level helicopter flights over the involved Wilderness Areas. Helicopters would only land in the Wilderness Areas in emergency situations.</p> <p>The action is being proposed in this manner because it is the most successful way to gather horses from the type of</p>	<p>Alt#2 Same as 1, but horses would only be herded by wranglers on horseback to traps located outside of wilderness.</p>	<p>Alt#3 Same as 1, but the horses would be gathered by setting up bait/water traps. To successfully remove horses from the wilderness areas the traps would need to be set up inside the wilderness areas. Traps would be transported to the sites by helicopter or by motorized vehicle using existing ways in the wilderness.</p> <p>Once the horses were trapped they would need to be transported out of the wilderness by truck. Motorized vehicle use would only be authorized on existing ways.</p>
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<p>terrain found in the wilderness areas.</p> <p>The proponent is the Winnemucca Field Office, BLM.</p> <p>The project would take place during the winter of 2009.</p> <p>Project will take place in the Calico Mountains, Warm Springs Canyon, Black Rock Range East, and Black Rock Range West HMAs which includes portions of the North black Rock Range, Pahute Peak, Calico Mountains, High Rock Lake, Little high Rock Canyon, East Fork High Rock Canyon and Black Rock Desert Wilderness Areas.</p> <p>The horses would be gathered by herding them with a helicopter to temporary corrals located outside of wilderness.</p>		
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Utilize the following criteria to assess each alternative (a brief statement should suffice)

Biophysical effects

-Describe the environmental resource issues that would be affected by the proposed action.

-Describe any effects this action will have on protecting natural conditions within the regional landscape, (i.e. non-native insects and disease, or noxious weed control)

-Include both biological and physical effects.

<p>Alt#1 The proposed action would have minimal impacts on the biophysical characteristics of the Wilderness Areas. There may be some trampling of vegetation and soil by the herding of the horses, but these impacts would be similar to those associated with the normal movement of large ungulates.</p>	<p>Alt#2 Same as 1</p>	<p>Alt#3 The trap sites would see an increase in soil and vegetation trampling due to the increase in horse numbers in the vicinity of the traps. The likelihood of transferring noxious weeds into the wilderness areas would increase by allowing the motorized vehicles to drive in and transport the horses out of the wilderness.</p>
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Social/recreation/experiential effects

-Describe how the wilderness experience may be affected by the proposed action

-Include effects to recreation use and wilderness character

-Consider the proposed effect the proposal may have on the public and their opportunity for discovery, surprise and self-discovery.

<p>Alt#1 Solitude would be impacted for the duration of the actual gather. The sites and sounds associated with a low flying helicopter would be heard and seen for long distances in the Wilderness Areas and would have an impact on the wilderness experience of visitors. This impact will be temporary and relatively short in duration, and will be mitigated because the gather will occur during a low visitor use season.</p>	<p>Alt#2 Solitude would be impacted for the duration of the actual gather. This alternative would have the least impact on solitude and the wilderness experience. The use of wranglers on horseback to herd the horses to traps would be less intrusive and would only impact the immediate area.</p>	<p>Alt#3 Solitude would be impacted for the duration of the actual gather. The site of the traps set up in wilderness would impact the wilderness experience of visitors. The use of helicopters or motorized vehicles to transport the traps and horses would impact the solitude of the area. This alternative would take the longest time to accomplish the task and would therefore impact the solitude of the areas for the longest time. Using motorized vehicles on the existing routes would probably increase the amount of motorized trespass along</p>
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Societal/political effects

-Describe any political considerations, such as MOUs, agency agreements, local positions that may be affected by the proposed action.

-Describe relationship of method to applicable laws

<p>Alt#1 BLM has made commitments to remove excess horses to achieve AML in the HMA.</p> <p>Wilderness groups have commented in favor of the project.</p> <p>BLM wilderness policy provides for the use of motorized and mechanized equipment, including aircraft use to remove excess wild horses and burros when no other alternatives exist.</p>	<p>Alt#2 Same as 1</p>	<p>Alt#3 Same as 1</p>
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Health and safety concerns

-Describe and consider any health and safety concerns associated with the proposed action. Consider the types of tools used, training, certifications and other administrative needs to ensure a safe work environment for employees. Also consider the effect the proposal may have on the health and safety of the public.

<p>Alt#1 Using low flying helicopters to herd horses can pose some safety concerns. Only experienced contractors with a good safety record would be allowed to conduct the work. The general public would not be put at risk by the project.</p>	<p>Alt#2 Under this alternative all herding would be by wranglers on horseback. This type of herding also has safety concerns such as; being thrown from a horse, horses falling over on riders, etc. The risk associated with this work would be increased because of the remoteness of the areas where the horses would be herded. The general public would not be put at risk by the project.</p>	<p>Alt#3 Under this alternative risks would involve those normally associated with driving motorized vehicles on rough terrain, and sling loading materials by helicopter. The general public would not be put at risk by the project.</p>
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Economic and timing considerations

- Describe the costs and timing associated with implementing each alternative
- Assess the urgency and potential cumulative effect from this proposal and similar actions

<p>Alt#1 This alternative would greatly decrease the amount of time that would be required for the project because the horses could be located quickly and then immediately herded to the corrals.</p>	<p>Alt#2 This alternative would take a much longer time to accomplish the goal of achieving AML. The wild horses would have to be located and then herded by the wranglers which would take a considerable amount of time.</p>	<p>Alt#3 This alternative would also take much more time to achieve AML than alternative#1. Because the traps would only hold a small number of horses, it would potentially take months to reach AML in the HMAs.</p>
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Formulate a preferred alternative from the above alternatives and describe in detail below

The preferred alternative is Alternative #1. This alternative would allow BLM to effectively achieve AML in the area while minimizing the impacts to solitude and primitive recreation by decreasing the amount of time that will be required for the gather. Helicopters will be used to herd the horses to trap sites located outside of wilderness. No landing of aircraft will occur in the Wilderness Areas other than for emergency purposes, and no motorized vehicles would be used in the Wilderness Areas.

Further refine the alternative to minimize impacts to wilderness

<p><i>-What will be the specific operating requirements?</i></p>	<p>All trap sites will be located outside of the Wilderness Areas. No motorized vehicles will be used inside the Wilderness Areas. No landing of aircraft will occur except in the case of an emergency.</p>
<p><i>-What are the maintenance requirements?</i></p>	<p>Census flights will occur after the gathers to determine population growth in the HMAs.</p>
<p><i>-What standards and designs will apply?</i></p>	<p>Standard operating procedures found in the EA will be used.</p>
<p><i>-Develop and describe any mitigation measures that apply?</i></p>	<p>Gather activities will avoid weekends or holidays to minimize the likelihood of impacting wilderness visitors.</p>
<p><i>-What provisions have been made for monitoring and feed back to strengthen future efforts and/or prevent the need for recurring future actions?</i></p>	<p>A monitoring plan was prepared with the EA that describes the methods that will be used.</p>